

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re

Chapter 11

GAWKER MEDIA LLC, *et al.*

Case No. 16-11700 (SMB)

Debtors.

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PLEASE TAKE NOTICE that, upon the annexed Declaration of Andrew G. Celli, Jr., Claimants will move this Court on September 29, 2016, or as soon as counsel may be heard before the HON. STUART M. BERNSTEIN at the United States Courthouse, One Bowling Green, New York, New York, for an order pursuant to Fed. R. Bankr. P. 9018 and Court's Individual Rules and further Claimants *ex parte* submission to this Court, sealing the application submitted to this Court *ex parte* on Tuesday, September 27, 2016, and granting Claimants leave to file Proofs of Claim under seal and granting such other relief as this Court may deem just and proper.

Dated: September 29, 2016
New York, New York

EMERY CELLI BRINCKERHOFF
& ABADY LLP

_____/s
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